

EX 1

AFFIDAVIT

Sarah L. Xavier, D.O.
Psychiatrist

652 George Washington Hgwy
Suite 400, Lincoln, RI

401.334.1830

2/21/2013

Re: Joseph Caramadre
DOB: 1-10-60

Dear Interested Party,

I am Mr. Caramadre's treating psychiatrist. I have been treating Mr. Caramadre since 10/13/11. I was asked by Mr. Caramadre to document medical facts, as they relate to his mental health, leading up to and around the time of November and December 2012.

I am treating Mr. Caramadre for Major Depressive Disorder, Recurrent and Severe and Obsessive Compulsive Disorder. For these symptoms, which are profound and disabling, he is currently being treated on a four-drug medication regimen.

Based on the documents that I have collected from his previous psychiatrist, his mental health condition has been longstanding and his symptoms have been largely treatment refractory. Mr. Caramadre has been aggressive in attempting to pursue relief. He has undergone multiple medication trials dating back to 2001 and he has also undergone Transcranial Magnetic Stimulation, a procedure often employed for refractory and severe major depression. He has also been engaged in weekly psychotherapy for an extended period of time.


Since the time of my first meeting with Mr. Caramadre, on 10/13/11, his profound, intrusive, relentless and ruminative worries have focused almost exclusively upon his current legal matter. The content of his obsessions have focused primarily on the need to declare his innocence to the world at large.

AFFIDAVIT

Due to the fixation and intensity of his need to declare his innocence, I have felt compelled, during our work together, to informally evaluate his ability to effectively assist counsel in his defense. Specifically, my medical concern was that Mr. Caramadre's Obsessive Compulsive Disorder, manifested as his intense need to declare his innocence, may have been suffocating his ability to effectively weigh the risks and benefits of all possible legal strategies. His vocalizations were intense and consistent over the course of the twenty-one of our sessions together: He would plead innocent (in order to declare his innocence). On 11/30/12 and 12/08/12, I received urgent calls from Mr. Caramadre (the only two calls registered as urgent since the inception of our work together). He vocalized that he had changed his plea, in the context of his wife's psychological frailty and that he was struggling with his decision. Shortly thereafter, Mr. Caramadre stated that his wife had stabilized and that he would seek withdrawal of his guilty plea.

I hereby swear that the above is true and correct to the best of my knowledge and belief under the penalty of perjury.

Respectfully,



Sarah L. Xavier, D.O

McAdams, John P. (USARI)

Subject: US v. Caramadre
Attachments: RESPONSE TO GOV.'S 4.19 REQUEST.pdf

From: Randy Olen [mailto:Randy.Olen@usari.com]
Sent: Sunday, April 21, 2013 6:10 PM
To: McAdams, John P. (USARI)
Subject: Re: US v. Caramadre

John:

I write in response to your email of Friday at 3:57 p.m., which unfortunately I did not view until after the close of business.

[REDACTED]

With respect to documents pertaining to what you have identified as "Number 1", I am unsure as to what you mean by "the notification from Caramadre to Lepizzera the week after Thanksgiving". Mr. Caramadre's affidavit at Paragraph 3 states that he advised Mr. Lepizzera "after the holiday". I will be happy to discuss clarification of this with you in greater detail at the conference. In any event, I have attached medical records from Dr Xavier which speak to his "suicidal ideation", as referenced in Paragraph 3, as well as an email from Mr. Caramadre to Mr. Lepizzera, which does the same.

I am filing a motion to continue the hearing, for the reasons stated in the motion, as well as others which I will discuss at the conference, in particular Mr. Watt's limited availability due to personal issues in his immediate family. I would appreciate your assent to this motion.

I will contact Ryan Jackson first thing tomorrow to ascertain what time we will be able to conference with Judge Smith, as I did not get word on that by the end of last week.

Regards,
Randy

WELLNESS PSYCHIATRIC SERVICES, LLC

TELEPHONE SERVICES

DATE:

12/08/12

PATIENT'S NAME:

Joe Caramadre

INFORMATION:

pt called 439 3441 @ 11:40 am

Received/returned call at 1:05.

left msg #1

1:11 left msg #2 inviting return call.

pt stated, "I want to tell you
what I'm saying"

Spoke c pt → ⊕ SI ⊖ intent (would not
want to hurt children/wife) but
wanted to repeat that thoughts are
more pressing. such

TREATMENT PLAN/RECOMMENDATIONS:

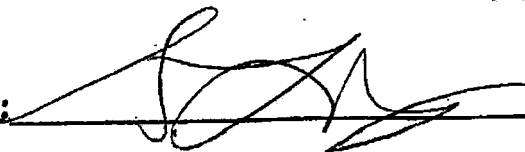
that he is repeating suicidal ideation to
religious affiliates (philosophical
expressions: SI - God intended/sanction
suicide if someone is in pain).

- he was afraid of psychosis b/c a bat
flew in the room - but timed out wife
confirmed that bat was in room

TIME SPENT:

- ↓ Zoloft to 25mg if level of
suicidality persists, call back +
make appt. If not, continue on

SIGNATURE:



20mg until next
appt + plan weeks
to attempt again
at that time. (If
unable, alternative SSRI)
SUT

WELLNESS PSYCHIATRIC SERVICES, LLC

TELEPHONE SERVICES

DATE: 11/30/12

PATIENT'S NAME: Joe Caramedre

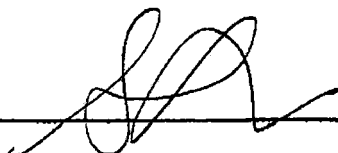
INFORMATION:

Left msg
↑ pm Klonopin dose from .5 → 1mg
+ schedule for earlier appt.
Spoke c pt:
Pt plead guilty + having
tough time c it

TREATMENT PLAN/RECOMMENDATIONS:

TIME SPENT: _____

SIGNATURE: _____



Joseph Caramadre

From: Joseph Caramadre
Sent: Saturday, December 08, 2012 2:01 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Thank you

[REDACTED], Mike, [REDACTED] & [REDACTED] (not in any particular order)

I write to express my sincerest gratitude for having the courage to step up and assist a brother in need. I already feel better just making a promise to all of you that I will not take any action to leave this place anytime sooner than God planned.

I have spoken with the doctor and we concurred that the interaction of newly prescribed drugs combined with the discontinuance of other prescriptions can cause irrationality. We have adjusted the delicate drug regimen in the hopes of reducing ideations which are not based on healthy, clear thoughts.

Nonetheless, your care and love (both collectively and individually) has further reinforced my belief that God exists, and has you gentlemen as his witnesses.

Please know you are in our family prayers. Thank you. Joe

On Dec 7, 2012, at 11:03 AM, [REDACTED] wrote:

Reminder: The Holy Apostles Men of St. Joseph will be meeting tomorrow, Saturday December 8th. Our meeting will begin at 8am (led by Jeff), followed by Mass in the church at 9am to celebrate the Feast of the Immaculate Conception of Mary.

Note that there will be no breakfast served in order to fast before mass; although we may wish to approach Monsignor to receive a dispensation for our coffee.

See you then.

In Christ,
[REDACTED]